

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

---

MICHAEL B. KINGSLEY,

Plaintiff,

vs.

Case No. 10-CV-832

LISA JOSVAI, PATRICIA FISH, ROBERT  
CONROY, STAN HENDRICKSON, FRITZ  
DEGNER, and KARL BLANTON,

Defendants.

---

**PROPOSED VOIR DIRE QUESTIONS OF DEFENDANTS**

---

Pursuant to the Court's Preliminary Pretrial Conference Order and Procedures Governing Final Pretrial Conference, defendants, Robert Conroy, Stan Hendrickson, Fritz Degner, and Karl Blanton, hereby submit additional voir dire questions to be asked in combination with the voir dire questions given by the Court as a matter of course.

Defendants request that this Court ask all of its standard voir dire questions. Defendants also request that this Court ask the following additional questions during voir dire:

1. Do you have a relative or close friend who has ever been a party to a lawsuit? If yes:
  - a. What type of lawsuit was it?
  - b. Was the lawsuit resolved in a manner agreeable to your relative or close friend?
  - c. Did the experience leave you with any strong impressions with regard to what goes on in a courtroom? If so, what were they?
2. If a member of the panel has previous jury experience:
  - a. On how many occasions have you served on a jury?
  - b. Have you served on criminal or civil juries, or both?

- c. Was there a verdict in the last case in which you served on jury? What was the verdict?
3. Do you know any of the witnesses in this case? If so, please explain.
4. Do you personally know anyone who is either employed by or otherwise associated with any of the parties to this case? If so, please explain.
5. What is your spouse's formal education?
6. Do you have any legal education or training? If so, please explain.
7. Do you have any family or close friends who are in the legal profession? If so, please explain.
8. Do you have any medical education or training? If so, please explain.
9. Do you have any family or close friends who are in the medical profession? If so, please explain.
10. Do you have any family or close friends who work for any governmental body or law enforcement agency? If so, please explain.
11. Have you, any member of your family, or a close friend had any unpleasant experience or encounter with a law enforcement officer, a law enforcement agency, or any other governmental body? If so, please explain.
12. Have you, any member of your family, or a close friend ever spent time in jail? If so, do you have any negative thoughts about how you or they were treated while in jail? Do you feel that this experience may affect your judgment?
13. In this case, the defendants are corrections officers or police officers. Do you believe that a police or corrections officer is less credible or less believable than any other person? There may be testimony from other law enforcement officers. Do you feel that they may be less credible because another officer is a defendant in this case?

14. Do you hold religious beliefs that might make it difficult to stand in judgment of another?

15. If the plaintiff fails to establish or prove that the defendants are at fault, will you be able to disregard your natural sympathy and be able to send him out of this Court without any monetary compensation?

16. You have heard the types of questions that have been asked of each of you as potential jurors. Do you know of anything in your background that we have not talked about that may cause you some difficulty in acting as a juror in this particular case?

17. What bumper stickers, if any, do you have on your car?

Dated this 7<sup>th</sup> day of September, 2012.

s/ Andrew A. Jones

Andrew A. Jones

Timothy H. Posnanski

WHYTE HIRSCHBOECK DUDEK S.C.

555 East Wells Street, Suite 1900

Milwaukee, WI 53202-3819

(414) 271-2300 Phone

(414) 223-5000 Fax

ajones@whdlaw.com

tposnanski@whdlaw.com

Attorneys for Defendants